




**STATE OF TENNESSEE
DEPARTMENT OF FINANCE AND ADMINISTRATION
DIVISION OF MENTAL RETARDATION SERVICES
ANDREW JACKSON BUILDING, 15TH FLOOR
500 DEADERICK STREET
NASHVILLE, TENNESSEE 37243**

March 30, 2006

MEMORANDUM

TO: Residential Services Providers
Day Services Providers
Independent Support Coordination Providers

FROM: Stephen H. Norris 
Deputy Commissioner
Division of Mental Retardation Services

SUBJECT: Interpretive Instructions Concerning Staffing for Residential and Day Services

The Division of Mental Retardation Service Provider Manual specifies the requirements that providers of residential and day services have for developing Staffing Plans that addresses the staffing needs of individuals to whom they provide services. These staffing plans must reflect compliance with licensure requirements, adequate numbers of staff to implement the ISP and ensure health and safety, reflect efficient use of staff to cover peak and overnight hours, availability of back up staff and the presence of at least one staff person in the home at all times an individual is present unless the ISP allows less than 24 hour supervision.

The responsibility for determining the staff necessary to meet these requirements for all of the individuals they serve and developing Staffing Plans for each home or day service site is that of the provider. That responsibility cannot be superseded by the Individual Support Plan or staffing requirements written by other professionals such as support coordinators, physicians, psychiatrists, behavior analysts, therapists or nurses, or by family, guardians or conservators.

The Individual Support Plan should clearly describe the types of assistance an individual needs and that may sometimes indicate a staffing requirement—e.g. "the person cannot transfer independently from bed to wheelchair and requires a two-person lift for the transfer". It is then the provider's responsibility to ensure that there is two staff available to assist the individual when he needs to transfer and to include that information as part of developing the staffing plan for the home. However, the requirement for the two person lift for one individual should not be interpreted to mean that the individual must

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have two staff dedicated exclusively to him twenty-four hours a day. The staffing plan will describe how staff will be available when they are needed.

DMRS is responsible for monitoring the adequacy of Staffing Plans. It does this through its various Quality Assurance activities, review of complaints, incidents and investigations.

Should you have any questions about this information, please contact the Regional Director or Donna Allen in my office.

SHN/DA

copy: Gail Thompson, TennCare
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Regional Directors
Central Office Directors
Quality Assurance Directors